

### **REMARKS**

In the Office Action, the Examiner rejected claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,006,987 to Harless (“Harless”), in view of U.S. Patent No. 6,604,141 to Ventura (“Ventura”), and U.S. Patent No. 5,983,190 to Trower et al. (“Trower”).

### **Summary of this Amendment**

By this Amendment, Applicants have amended claims 1, 3, 4, 7, 8, 10-13, 15, and 18 to more particularly point out what Applicants regard as their invention, and added claim 20 to protect additional features of their invention. Furthermore, in light of the following remarks, Applicants respectfully request the timely reconsideration and allowance of pending claims 1-20.

### **Detailed Response**

The rejections of claims 1-19 as unpatentable under 35 U.S.C. § 103(a) are respectfully traversed. To establish obviousness under 35 U.S.C. § 103(a), each of three requirements must be met. First, the reference or references, taken alone or in combination, must teach or suggest each and every element recited in the claims. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must “be found in the prior art, and not be based on applicant’s disclosure.” (*See* M.P.E.P. § 2143 (8<sup>th</sup> Ed. 2001)). Applicants submit that these requirements have not been met for at least the following reasons.

Independent claim 1 recites a combination including, for example, “a client node” comprising “a client agent for recognizing a meaning of a user voice input.” Applicants submit

that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. As the Examiner admitted, and Applicants agree, “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node,” let alone one with the features recited in claim 1. Ventura fails to cure this deficiency, that is, it fails to disclose or suggest “a client node” comprising “a client agent for recognizing a meaning of a user voice input,” as recited in claim 1. In particular, Ventura is limited to receiving input in the form of text strings (*see* Fig. 3 and accompanying text), and nothing in Ventura discloses or suggests “a user voice input.” Accordingly, nothing in Ventura can disclose or suggest “a client agent for recognizing a meaning of a user voice input,” as recited in claim 1.

Finally, Trower similarly fails to cure the deficiencies of Harless and Ventura. That is, Trower also fails to teach “a client node” comprising “a client agent for recognizing a meaning of a user voice input,” as recited in claim 1. In fact, Trower teaches that a speech recognition function is performed in the server (see Figure 3, 118), and not in the client node, as recited in claim 1. Not only does Trower not disclose or suggest including such a feature in the client node, but it also teaches away from including them in the client node. More specifically, Trower states that “[t]he content of a web page preferably should be small in size so that it is easy to download, it should be secure and it should be portable. These design issues make it difficult to develop interactive simulation for web pages on the Internet.” (Col. 2, lines 16-20). In view of these warnings, one of ordinary skill in the art would not be motivated to modify the teachings of Trower to achieve the claimed invention. Applicants therefore submit that no combination of Harless, Ventura, and Trower disclose or suggest the claimed combination.

Accordingly, Applicants submit that claims 1 and 2 (by virtue of its dependence from claim 1), are allowable.

Independent claim 3 recites a combination including, for example, “a client node” comprising “means for recognizing a meaning of the received user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node,” let alone one with the features recited in claim 3. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose any user voice input, and therefore cannot disclose or suggest any “means for recognizing a meaning of a user voice input,” as recited in claim 3. Finally, Trower also fails cure these deficiencies, because it too fails to teach or suggest “a client node” comprising “means for recognizing a meaning of the received user voice input,” as recited in claim 3. As noted above, while Trower discloses a speech recognition engine as part of the server, it does not disclose, and, in fact teaches away from, including a “means for recognizing a meaning of the received user voice input” as part of “a client node,” as recited in claim 3. Accordingly, Applicants submit that claim 3 is allowable, because no combination of Harless, Ventura, and Trower renders the claimed combination obvious.

Independent claim 4 recites a combination including, for example, “a client node” comprising “a client agent recognition engine for determining the meaning of the user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,”

(O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node,” let alone one with the features recited in claim 4. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user voice input,” and therefore cannot disclose or suggest a “client agent recognition engine for determining the meaning of the user vocal input,” as recited in claim 4. Finally, Trower also fails cure these deficiencies, because it too fails to teach or suggest “a client node” comprising “a client agent recognition engine for determining the meaning of the user vocal input,” as recited in claim 4. As noted above, while Trower discloses a speech recognition engine in a server, it fails to teach, and in fact teaches away from, “a client node” comprising “a client agent recognition engine” as recited in claim 4.

Accordingly, Applicants submit that independent claims 4 and dependent claims 5, and 6 (by virtue of their dependence from allowable claim 4) are allowable, because no combination of Harless, Ventura, and Trower renders the claimed combinations obvious.

Independent claim 7 recites a combination including, for example, “a client node” comprising “means for determining the meaning of the user vocal input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node” let alone one with the features recited in claim 7. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest a “user voice input, and therefore cannot disclose or suggest any “means for determining the meaning of the user vocal input,” as recited in claim 7. Finally, Trower also fails cure these deficiencies, because it too fails to teach or suggest “means

for determining the meaning of the user vocal input,” as part of a “client node,” as recited in claim 7. As noted above, while Trower discloses a speech recognition engine in the server, it fails to teach, and in fact teaches away from, including such a feature as part of “a client node.” Accordingly, Applicants submit that no combination of Harless, Ventura, and Trower renders the claimed combination obvious.

Independent claim 8 recites a combination including, for example, “a server” comprising “a connection receiving over the network signals representative of a meaning of a user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “server” let alone one with the features recited in claim 8. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user voice input,” and therefore cannot disclose or suggest “receiving ...signals representative of a meaning of a user voice input,” as recited in claim 8. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine as part of the server, it fails to teach “a connection receiving over the network signals representative of a meaning of a user voice input.” In fact, Trower teaches away from such a feature because it prefers that functions such as determining the meaning of user voice input be performed at the server. Accordingly, Applicants submit that no combination of Harless, Ventura, and Trower renders the claimed combination obvious. Applicants therefore submit that claim 8, and claim 9 (by virtue of its dependence from claim 8) are allowable.

Independent claim 10 recites a combination including, for example, “a server” comprising “means for receiving over the network signals representative of a meaning of a user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “server,” let alone one with the features recited in claim 10. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura neither discloses nor suggests “user voice input,” and therefore cannot disclose or suggest any “means for receiving over the network signals representative of a meaning of a user voice input,” as recited in claim 10. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine as part of the server, it fails to teach “means for receiving over the network signals representative of a meaning of a user voice input.” In fact, Trower teaches away from such a feature because it prefers that functions such as determining the meaning of user voice input be performed at the server. Accordingly, claim 10 is allowable.

Independent claim 11 recites a combination including, for example, “transmitting to the server signals corresponding to the recognized meaning of the user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “server,” let alone one with the features recited in claim 11. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura therefore fails to disclose or suggest any “user vocal input” let

alone “transmitting to the server signals corresponding to the recognized meaning of the user voice input,” as recited in claim 11. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine at the server, it fails to disclose, and in fact teaches away from, including such a feature anywhere other than the server. In contrast, claim 11 recites a combination including “transmitting to the server signals corresponding to the recognized meaning of the user voice input.” Accordingly, claim 11 is allowable.

Independent claim 12 recites a combination including, for example, “receiving from a client node signals representative of a recognized meaning of a user voice input.” The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node” as recited in claim 12. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user vocal input,” and therefore cannot disclose or suggest “receiving from a client node signals representative of a recognized meaning of a user voice input,” as recited in claim 12. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine at the server, it fails to disclose or suggest, and in fact teaches away from, including such a feature anywhere other than the server. In contrast, claim 10 recites a combination including “receiving from a client node signals representative of a recognized meaning of a user voice input.” Accordingly, no combination of Harless, Ventura, and Trower renders the claimed combination obvious.

Independent claim 13 recites a combination including, for example, “transmitting, by the client node to the server, signals corresponding to the meaning of the user voice input.” The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network

and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “server” or “client node,” let alone one with the features recited in claim 13. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user vocal input,” and therefore cannot disclose or suggest “transmitting, by the client node to the server, signals corresponding to the meaning of the user voice input,” as recited in claim 13. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine at the server, it fails to disclose, and in fact teaches away from, including such a feature anywhere other than the server. In contrast, claim 10 recites a combination including “transmitting, by the client node to the server, signals corresponding to the meaning of the user voice input.” Accordingly, claim 13 is allowable. Furthermore, claim 14 is allowable by virtue of its dependence from claim 13.

Independent claim 15 recites a combination including, for example, a “method performed by a client node” comprising “determining a meaning of the user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node,” let alone one with the features recited in claim 15. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user voice input,” and therefore cannot disclose or suggest “determining a meaning of the user voice input,” as recited in claim 15. Finally, Trower also fails cure these deficiencies, because it too fails to teach or suggest “a client node” “determining a meaning of the user voice input,” as recited in claim 15. As noted



above, while Trower discloses a speech recognition engine at a server, it fails to disclose, and in fact teaches away from, including such a feature as part of “a client node.” Accordingly, Applicants submit that claim 15 is allowable, because no combination of Harless, Ventura, and Trower renders the claimed combination obvious. Furthermore, by virtue of their dependence from claim 15, dependent claims 16 and 17 are also allowable.

Independent claim 18 recites a combination including, for example, “receiving from the client node signals representative of a meaning of a user voice input.” Applicants submit that the combination of Harless, Trower, and Ventura fails to disclose or suggest such a combination. The Examiner admitted, and Applicants agree that “Harless does not expressly disclose a network and network connection for system interactive as claimed,” (O.A. at pp. 2-3.) and thus fails to disclose or suggest any “client node,” let alone one with the features recited in claim 18. Furthermore, as noted above, Ventura is limited to textual input (*see* Figure 3 and accompanying text). Ventura fails to disclose or suggest any “user voice input,” and therefore cannot disclose or suggest “receiving ... signals representative of a meaning of a user voice input,” as recited in claim 18. Finally, Trower also fails cure these deficiencies. As noted above, while Trower discloses a speech recognition engine as part of the server, it fails to teach “receiving from the client node signals representative of a meaning of a user voice input.” In fact, Trower teaches away from such a feature because it prefers that functions such as determining the meaning of user voice input be performed at the server. Accordingly, Applicants submit that claim 18 is allowable. Furthermore, by virtue of its dependence from claim 18, dependent claim 19 is also allowable.

**New Claim 20**

Applicants submit that new claim 20 is also allowable, for at least the same reasons as set forth above regarding claim 11.

**Conclusion**

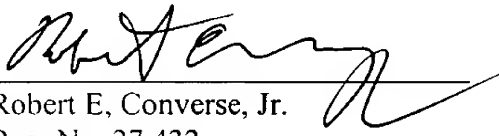
In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of pending claims 1-20, as amended.

Please grant any extensions of time required to enter this response and charge any additional required fees to deposit account 06-0916.

Respectfully submitted,

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